



**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE**

D.T.C. 22-1

March 25, 2022

Petition of the State 911 Department for Approval of Fiscal Year (“FY”) 2022 Expenditures, FY 2023 Development Grant Amount, FY 2023 Incentive Grant Regional PSAP Three to Nine Communities Category Percentage, and FY 2023 Incentive Grant Regional Emergency Communications Center Category Percentage

---

**FIRST SET OF INFORMATION REQUESTS  
OF THE DEPARTMENT OF TELECOMMUNICATIONS AND CABLE  
TO THE STATE 911 DEPARTMENT**

Pursuant to 207 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Cable (“Department”) submits to the State 911 Department (“911 Department”) the following information requests:

Instructions

1. Each request should be answered in writing on a separate page with a recitation of the request, a reference to the request number, the docket number of the case, and the name of the person responsible for the answer.
2. These requests shall be deemed continuing so as to require supplemental responses if the 911 Department or its witness(es) receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
3. The term “provide complete and detailed documentation” means: Provide all data, assumptions, and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports, and planning documents from which data, estimates, or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting work-papers. Provide live Excel spreadsheets.
4. The term “document” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, press releases, handwritten and/or typed notes, records, reports, bills, checks, articles from journals and/or other sources, e-mails, SMS text messages, blog postings, RSS feeds, web pages, social media postings such as Facebook and Twitter, and/or other data compilations from which information can be

obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.

5. The term “Development Grant” refers to the Regional and Regional Secondary PSAP and RECC Development Grant outlined in G.L. c. 6A, § 18B(i)(5).
6. The term “E911” means Enhanced 911.
7. The term “FY” means fiscal year.
8. The term “Incentive Grant” refers to the Regional PSAP and RECC Incentive Grant and its four mechanisms, the Regional PSAPs Serving Two Municipalities mechanism, the Regional PSAPs Serving Three to Nine Municipalities mechanism, the Regional PSAPs serving Ten or More Municipalities mechanism, and the RECCs mechanism, outlined in G.L. c. 6A, § 18B(i)(4).
9. The term “Support Grant” is defined in G.L. c. 6A, § 18B(i)(2).
10. The term “EMD Grant” refers to the Emergency Medical Dispatch Grant. The statutory definition of Emergency Medical Dispatch is in G.L. c. 6A, § 18A.
11. The term “NG 911” means Next Generation 911.
12. The term “Petition” means the petition filed by the 911 Department to initiate this proceeding, as filed on March 3, 2022.
13. The term “PSAP” means a “public safety answering point” as that term is defined by G.L. c. 6A, § 18A.
14. The term “RECC” means a “regional emergency communication center” as that term is defined by G.L. c. 6A, § 18A.
15. If any one of these requests is ambiguous, notify the Department so that the request may be clarified prior to the preparation of a written response.
16. File responses with Shonda D. Green, Secretary of the Department, not later than the close of business on **April 6, 2022**.

#### Requests

- D.T.C. 1-1 Please provide a summary by provider type (wireline, wireless, VoIP, prepaid) of actual subscriber counts, surcharge revenue, and uncollectible revenue for FY 2021. In addition, please provide a calculation of the net surcharge revenue for FYs 2022-2025 showing the number of subscribers used in projections.
- D.T.C. 1-2 Please provide the number of wireless calls processed in FY 2022 to date by:

- a. Direct Wireless PSAPs;
- b. The 911 Department's Framingham Wireless PSAP; and
- c. The State Police Northampton PSAP.

- D.T.C. 1-3 Please refer to page 12 of the Petition. Please explain how the approximately \$50 million saved on radio replacements and upgrades has been distributed throughout the other categories of radio infrastructure expenditures such that the total project cost is now estimated at \$132.5 million as opposed to the original projection of \$125 million.
- D.T.C. 1-4 Please refer to page 12 of the Petition to answer the following questions:
- a. Please confirm that "\$5.8" should read \$5.8 million.
  - b. Please confirm that the \$5.8 amount is included in the \$25.4 million mentioned earlier on the page.
- D.T.C. 1-5 Please state whether the 911 Department will incur expenses for the radio infrastructure project after FY 2026.
- D.T.C. 1-6 Provide an updated breakdown of the total cost of the radio infrastructure project by the cost categories provided in the June 2017 Study, page 11, CoMIRS Executive Summary (Version 1.0): Radio Site Preparation, Radio Site Digital Equipment, Central Switching Equipment, Dispatch Console Equipment, Subscriber Equipment, FDMA Radio Site Upgrades, and Engineering and Project Management.
- D.T.C. 1-7 Other than the cost of the radio infrastructure upgrade project, please explain how the remaining revenue from the \$0.50 911 surcharge increase effective January 1, 2019, was and will be used.
- D.T.C. 1-8 Referring to the request in the Petition at page 1, note 1 that this Petition satisfy the obligation of the 911 Department to report on "the new developments affecting the enhanced 911 system," please provide to the extent not already provided in the 2021 CoMIRS Annual Report and consistent with the D.T.C. 20-1 Final Order, "a detailed list of current fiscal year CoMIRS expenditures separate from its general operational expenditures, and a detailed list of funding sources for the CoMIRS project including the total CoMIRS cost and the funding contribution from each source."
- D.T.C. 1-9 Please refer to Exhibit A to the Petition. The 911 Department reports a final Radio Infrastructure expenditure of \$6,797,752 out of a projected \$40,829,910 in FY 2021. The 911 Department further projects Radio Infrastructure expenditures of \$22,128,002 in FY 2022. For the Radio Infrastructure project:

- a. Provide a detailed breakdown of previously projected and actual expenditures for FY 2021.
  - b. Provide a detailed breakdown of projected and actual expenditures to date for FY 2022.
  
- D.T.C. 1-10 Please refer to page 12 of the Petition, which states that nearly 7,000 active/non-compliant subscriber units will be replaced, and 3,650 units will be upgraded.
  - a. Provide a breakdown of “active/non-compliant” subscriber units by user.
  - b. Identify the subscriber unit models the 911 Department has purchased for the replacement program, including model name, unit cost, and expected lifespan.
  - c. Clarify what is meant by “upgrade,” how it is determined when an upgrade is needed, and who makes that determination.
  - d. Provide a breakdown of subscriber units to be upgraded by user.
  
- D.T.C. 1-11 Please refer to the Petition at pages 5 and 13, and Exhibit A, Capital Projects. Please provide an update on the status of the wireless center relocation, the reasons behind the delay, and the projected cost increase of \$200,000 as compared to the 911 Department’s petition in D.T.C. 21-3.
  
- D.T.C. 1-12 Please refer to the 911 Department’s response to IR 1-5 from D.T.C. 21-3. The 911 Department lists a line item titled “Wireless State Police PSAP Grant - Extension” which incurred an actual expense of \$500,000 for FY 2021 through November 30, 2020. The same line item in the current Petition, Exhibit A is listed as \$273,786 for the FY 2021 final expenditure. Please explain this discrepancy.
  
- D.T.C. 1-13 On Page 4 of the Petition, the 911 Department states that it does not earn interest on the total fund balance but only on the invested funds. However, in the last sentence of the same paragraph the 911 Department states it has applied the interest rate to the fund balance. Please explain this discrepancy.
  
- D.T.C. 1-14 Please provide an updated Exhibit A showing actual expenditures for FY 2022 to date.
  
- D.T.C. 1-15 Please provide an assessment of the cost efficiency of the PSAP regionalization since its inception.
  
- D.T.C. 1-16 Please refer to Exhibit A under “Programs.” Please provide a detailed account of how the 911 Department projects expenditures for SCPE.
  
- D.T.C. 1-17 Please refer to Exhibit A under “Programs.” Please explain the difference between FY 2021 actual expenditures and FY 2021 projected expenditures in the CapTel line item. Please also explain the increase in the projected amount in the CapTel line item for FY 2022.

- D.T.C. 1-18 Please refer to Exhibit A of the Petition, Development Grant Roll Over, to answer the following questions:
- a. Identify previously projected Roll Over expenditures and final disbursements by PSAP for FY 2021.
  - b. Identify previously projected Roll Over expenditures and Roll Over funds disbursed to date by PSAP for FY 2022.
- D.T.C. 1-19 Please refer to the Petition at 17. The 911 Department reports receiving Development Grant requests totaling \$39,794,023 in FY 2022. For the FY 2021 Development Grant:
- a. Provide a detailed breakdown of grant requests by PSAP and purpose.
  - b. Provide a detailed breakdown of grants already disbursed by PSAP and purpose.
- D.T.C. 1-20 Please refer to the 911 Department's response to the Supplemental Record Requests in D.T.C. 21-3. Please provide an update of the PSAPs and RECCs that requested an extension of time for usage of their development grant funds in FY 2021 through FY 2022, and the status of such funds. Please include any further extensions granted.
- D.T.C. 1-21 Please refer to Exhibit B projections for FY 2022-2026 NG 911 non-recurring and recurring expenses and the projections for those line items in Exhibit B in the 911 Department's petition in D.T.C. 21-3.
- a. Please explain the almost \$30 million increase in projected expenses for FY 2022-2025.
  - b. Please refer to page 9 of the Petition and provide a more detailed explanation regarding how the 911 Department developed its projections for FY 2024-2026.
  - c. Please break down the NG 911 non-recurring and recurring expenses projected for FY 2022-2026 by subcategories of expenses.
- D.T.C. 1-22 Please refer to Exhibit A of the Petition. Please explain the difference between FY 2021 actual expenditures and FY 2021 projected expenditures in the NG 911 non-recurring line item.
- D.T.C. 1-23 Please refer to Exhibit A of the Petition, NG 911 Recurring expenditures, to answer the following questions:
- a. Provide a detailed breakdown of previously projected and actual expenditures for FY 2021.
  - b. Provide a detailed breakdown of projected and actual expenditures to date for FY 2022.

- c. Referring to the 911 Department's response to IR 1-10 in D.T.C. 21-3, please describe whether there have been any changes regarding how NG 911 Recurring expenditures paid to Comtech are determined and paid out, and provide the schedule by which the 911 Department pays Comtech for NG 911 Recurring expenditures.
- d. Please confirm that the 911 Department still does not pay NG 911 Recurring expenses to any entity other than Comtech. If the 911 Department does pay NG 911 Recurring expenses to another entity, please identify the entities.

D.T.C. 1-24 For the RECC category of the Incentive Grant, please provide a detailed breakdown of previously projected and actual expenditures for FY 2021. Please also provide a detailed breakdown of projected and actual expenditures to date for FY 2022.

D.T.C. 1-25 For FY 2021, and to date for FY 2022, please provide grants paid out by PSAP for:

- a. EMD Grant;
- b. Support and Incentive Grant; and
- c. Training Grant

D.T.C. 1-26 Please provide a monthly breakdown of the Enhanced 911 Fund size for FY 2021.

D.T.C. 1-27 Please provide an estimate of the 911 Department's required operational cash reserves for FY 2022-2026, exclusive of capital projects.